

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS FEDERAL CREDIT UNION)
and THE SUMMIT FEDERAL CREDIT)
UNION, on Behalf of Themselves and All) Case No. 19-cv-4492 (PKC)
Others Similarly Situated,)
Plaintiffs,) **PLAINTIFFS' UNOPPOSED MOTION**
v.) **FOR FINAL APPROVAL OF CLASS**
) **ACTION SETTLEMENT**
HUDSON'S BAY COMPANY, SAKS)
FIFTH AVENUE LLC, SAKS &)
COMPANY LLC, SAKS)
INCORPORATED, AND LORD &)
TAYLOR, LLC)
Defendants.)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 7, 2021, at 2:30 p.m., before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Plaintiffs Arkansas Federal Credit Union and The Summit Federal Credit Union, by and through Class Counsel, will move and hereby do move for an order, pursuant to Fed. R. Civ. P. 23(b)(2), 23(b)(3), & 23(e), (1) certifying the Settlement Class; and (2) granting final approval to the Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely on the accompanying memorandum of law, the Declaration of Kari L. Schimdt of Analytics Consulting LLC, the previously filed Declaration of Joseph P. Guglielmo (ECF No. 86), the Supplemental Declaration of Joseph P. Guglielmo, and the accompanying exhibits. Plaintiffs' counsel have conferred with Defendants' counsel and confirmed that Defendants do not oppose Plaintiffs' Motion.

Dated: November 1, 2021

Respectfully submitted,

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